

## REMARKS

Claims 1-18 remain in the case. Claims 1, 4-5, 8, 10-13, and 15-18 stand rejected. Claims 2-3, 6-7, 9, and 14 stand objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

### CLAIM REJECTIONS UNDER 35 U.S.C. § 102(e)

Specifically, claims 1, 4-5, 8, 10-13, and 15-18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Hubis et al. (U.S. Patent No. 6,343,324). Applicants respectfully traverse this rejection for the reasons outlined below.

The M.P.E.P requires that a rejection under 35 U.S.C. § 102(e) be based on a comprehensive and detailed disclosure of each and every element claimed.<sup>1</sup> The cited reference, Hubis, does not set forth each and every element of the claimed invention and therefore cannot serve as the basis for a proper rejection under 35 U.S.C. § 102(e).

The present application is directed toward the problem of contending (or conflicting) assignments of device IDs on a SCSI bus. The application specifically describes one example in which an assignment for a second host conflicts with an assignment for a hard disk drive (both

---

<sup>1</sup> M.P.E.P § 2136.02 states:

“When a U.S. patent . . . is used to reject claims under 35 U.S.C. 102(e), the disclosure relied on in the rejection must be present in the issued patent.”

M.P.E.P § 2131 states:

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” (citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

“The identical invention must be shown in as complete detail as is contained in the . . . claim.” (citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

assigned to slot #6). As recited in each of the independent claims 1, 5, 8, and 13 and as acknowledged in the present Office Action, one feature of the claimed invention is the assignment of identical device IDs to 1) a host computer, and 2) another device.

Hubis makes no reference to conflicting assignments as claimed in the present application. In general, Hubis is directed to controlling access by multiple hosts to a shared storage device. In particular, the cited portions of Hubis describe certain aspects of such control, but do not describe identical or conflicting ID assignments between a host and another device.

With regard to claims 1, 5, and 8, the Office Action states that Hubis discloses identical ID assignments in two locations: col. 10, lines 32-57 and col. 11, lines 8-16. Neither of these references discloses identical ID assignments. The first reference (col. 10) describes volume mapping, which is used to map individual hosts to distinct logical volumes on a storage device. Certain identifiers may be used in such volume mapping, but the reference does not disclose any type of contending or conflicting ID assignments. The second reference (col. 11) describes a port mapping table, which defines how each host port connects to each logical volume. Once again, there is no disclosure of conflicting ID assignments.

With regard to claim 13, the Office Action states that Hubis discloses identical ID assignments in two additional locations: col. 12, lines 44-64 and col. 14, lines 23-40. (Interestingly, these references were also cited, however erroneously, in the Office Action with regard to claims 1, 5, and 8 as disclosing the reset signal determined by the state of the host terminal power). As with the above references, neither of these references discloses identical or conflicting ID assignments.

The first reference (col. 12) describes a volume permission table, which may have entries of "0" or "1" to indicate whether a particular host may access a particular logical volume. The latter portion of the reference also discusses read and write operations to a logical volume. Nowhere in the first reference does Hubis provide any disclosure of conflicting ID assignments. The second reference (col. 14) describes mapping a loop ID to a host World Wide Number (WWN), which helps determine if a particular host should have access to a particular logical volume. Yet again, there is no disclosure of conflicting ID assignments.

Given that Hubis does not disclose identical or conflicting ID assignments for a host and another device, Hubis cannot properly serve as an anticipatory prior art reference under 35 U.S.C. § 102(e). In addition to the unanticipated feature of conflicting ID assignments, Applicants assert that many other features of the claimed invention in the present application are not anticipated by Hubis. These additional unanticipated features, although not discussed in detail herein, include 1) establishing that a terminal power of a host is active, 2) inputting a reset signal as described, 3) outputting a reset signal as described, and 4) a conflict resolution module configured to provide a reset signal under the conditions described.

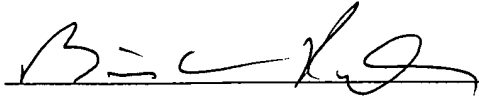
#### CONCLUSION

As a result of the presented remarks, Applicants respectfully assert that independent claims 1, 5, 8, and 13 are in condition for prompt allowance. Consequently, dependent claims 2-4, 6-7, and 9-18, which depend from these independent claims, are also in condition for prompt allowance.

Should additional information be required regarding the traversal of the rejections of the independent and dependent claims enumerated above, the Examiner is respectfully asked to

notify Applicants of such need. If any impediments to the prompt allowance of the claims can be resolved by a telephone conversation, the Examiner is respectfully requested to contact the undersigned.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'B. C. Kunzler', is written over a horizontal line.

Brian C. Kunzler

Reg. No. 38,527

Attorney for Applicants

Date: March 16, 2004  
8 East Broadway  
Suite 600  
Salt Lake City, UT 84101  
Telephone (801) 994-4646  
Fax (801) 531-1929